Louisiana-Pacific Corporation	**)**	**Department**
Aroostook County	**)**	**Findings of Fact and Order**
New Limerick, Maine	**)**	**Part 70 Air Emission License**
A-327-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Louisiana-Pacific Corporation
LICENSE NUMBER	A-327-70-A-I
LICENSE TYPE	Initial Part 70 License
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	Station Road, New Limerick, Maine
DATE OF LICENSE ISSUANCE	December 19, 2000
LICENSE EXPIRATION DATE	December 19, 2005

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
#1 Thermal Oil Heater	27.1 MMBtu/hr Wood	Heater
#2 Thermal Oil Heater	27.1 MMBtu/hr Wood	Heater
#1 & #2 Thermal Oil Heater Shared Oil Gun	20.0 MMBtu/hr Oil	Heater
Dryer RTO	13.5 MMBtu/hr Propane or Natural Gas	Regenerative Thermal Oxidizer
Press RTO	11.2 MMBtu/hr Propane or Natural Gas	Regenerative Thermal Oxidizer
Core Line Dryer	44.0 MMBtu/hr Wood & 34.6 MMBtu/hr Oil	Dryer
Surface Line Dryer	44.0 MMBtu/hr Wood & 34.6 MMBtu/hr Oil	Dryer
Diesel Fire Pump	1.2 MMBtu/hr Diesel Fuel	Fire Pump
Hydraulic Press	518 tons/day production limit	Board Press

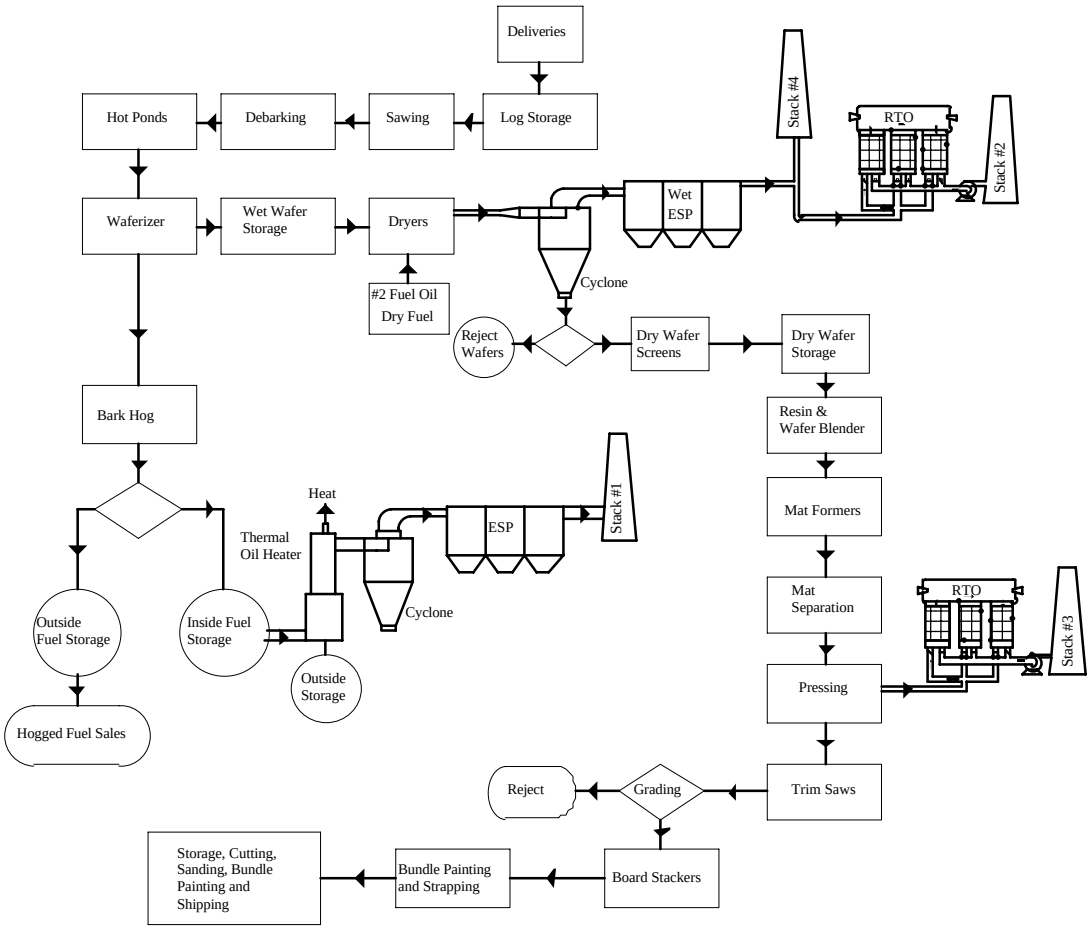
Louisiana-Pacific Corporation (LP) has additional activities not listed in the emission equipment table above, that are insignificant, but may be found in the application submitted in October, 1999.

C. Application Classification

The application for LP does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Overview



The main wood supply to the facility is poplar, with the potential to use other woods. Wood is received in log lengths (8' to tree length) and used in the order of receipt to allow for uniform aging. Logs are cut to a maximum length of 17', then fed to a debarker and conveyed to a log conditioning system which transfers the logs to the waferizer infeed conveyor where they are loaded with a knuckle boom loader.

Bark, broken ends, small ends, and wood waste are collected by a series of conveyors and sent to the bark hog for use as fuel in the thermal oil-heaters. LP operates two Thermal Oil Heaters (TOH) for facility heat. These units can burn either wood or oil as fuel. Pollution control on these units consists of a cyclone followed by a dry electrostatic precipitator (ESP).

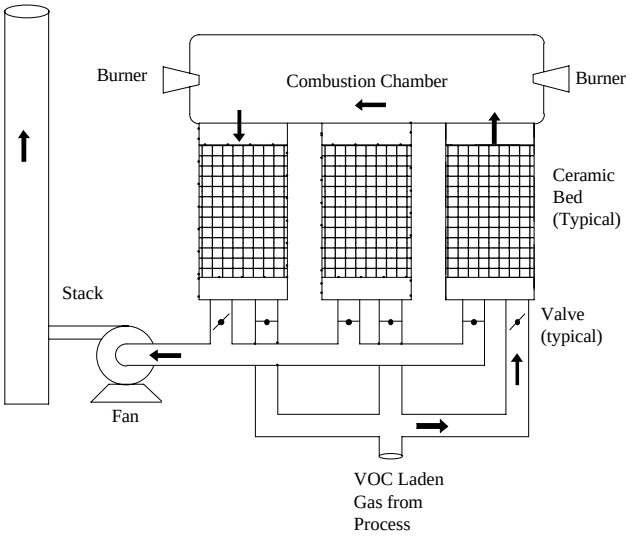
The waferizer produces wafers that are approximately 0.024" thick and 1" wide by 3" to 5" long. The wafers are moved to the two wet wafer storage bins. These bins are arranged to supply a continuous delivery of wafers to the two rotary dryers.

The two separate lines process wafers to be used in the core of the final board and wafers to be used as the top and bottom surface of the final board. Both dryers normally fire wood, but may also fire #2 fuel oil. Wafers are conveyed to two triple pass dryers, where the moisture content on the core line is reduced to 4% and the moisture content on the surface line is reduced to 6-7%. Wafers leaving each dryer pass into each dryer's own cyclone where the wafers are separated from the air stream.

Exhaust gases and wafer fines are drawn into the primary cyclones where the wafers and fines are separated from the exhaust gases. The gases continue into a wet ESP, through an induced draft fan, and through a regenerative thermal oxidizer (RTO) prior to being discharged to the atmosphere via the stack.

An ESP operates by removing particles from flue gas using electric charge. The metal plates of the ESP impart a charge on the particles and the particles are attracted to a collection electrode. In a wet ESP, the collected particles are removed from the collection electrode with water. LP is allowed to dispose of this waste water in the thermal oil heaters, or by mixing with the wafers in the wet storage bins or added to the log conditioning ponds, or in the ash enclosure.

LP operates an RTO as a VOC incinerator (see diagram below). The exhaust gas enters through a bed of heated packed ceramic saddles, which preheat the flue gas. Once through the saddles, the gas enters the direct flame chamber. Here pollutants are incinerated and converted to carbon dioxide and water. The gases then pass through another layer of packed ceramic saddles where the heat in the gases is transferred back to the saddles. The gases then pass through a valve and are drawn through a fan and discharged up the stack.



During RTO operation, condensed particles accumulate on the ceramic media and increase pressure drop. As a result, the RTO must be taken through a bake-out process to clean the ceramics. During the bake-out process, the unit is taken off line and the temperature of the ceramic is heated until excess material coating the ceramic is burned off.

LP has a bypass system for emergency situations. In an emergency shut down, gases bypass the RTO unit and are vented to the atmosphere directly from the ESPs via Stack #4.

Wafers discharging from the cyclones are conveyed into two rotary dryer screens. The screens remove fines, which are fed to the dryer fuel system. The dried wafers are then conveyed to the two dry wafer storage bins.

Dry wafers are fed to two blenders, where resin and wax are added at a rate controlled by the final product characteristics. From the blenders, the wafers are conveyed to the surge hoppers located in the forming heads over the forming line.

Wafers are metered from the formers onto a continuous moving screen line system which is a nominal 8' wide. The formed wafer mats are separated into nominal 16' lengths and then deposited into the press by the press loader, which accumulates 12 mats prior to loading the press. The press system includes the

necessary hydraulic equipment, heating oil circulation system and controls to manufacture the products as desired. The press utilizes the heated oil from the thermal oil heaters to deliver an effective board pressure of up to approximately 750 psig. Emissions from the press are controlled by an RTO.

Finished rough boards are removed from the press by the press unloader. The finished rough boards are ejected from the press unloader and travel through a trim saw where they are cut into two 4' x 16' panels, then under a transfer saw where the 4'x16' panels are reduced to 4'x8' panels. The saw system has the ability to make any size boards up to 8' x 16' based on customer orders. The trimmed boards are conveyed to the grade line where they are edge sealed, banded, and placed in the warehouse for shipment. All dry trim material and sawdust is reclaimed for use as fuel.

Particulate emissions from the Core and Surface Dry Bins, the Core and Surface Blender Infeed Conveyors, the Top and Bottom Surface Former Infeed, and the Bottom Surface Former are sent to the Dry Bin Baghouse. This baghouse, as well as others, vent indoors. As such, they are considered insignificant.

B. Thermal Oil Heaters #1 and #2

Thermal Oil Heaters (TOH) #1 & #2 were manufactured by Konus-Kessel in 1981, each with a maximum design heat input of 27.1 MMBtu/hr firing wood. TOH #1 and #2 also share a 20.0 MMBtu/hr backup oil burner firing #2 fuel oil. Bearing grease, oil soaked rags, floor sweepings containing oil (all of which must meet the criteria of specification waste oil), and cleanup residue from the blenders and former infeed conveyors may also be burned in the TOH. Emission from these heaters flow through a set of cyclones, an ESP and then exit through Stack #1.

Based on AP-42 factors for lead emissions from the burning of wood/bark (Table 1.6-5, dated 2/98), levels of lead emitted from these pieces of equipment will not trigger the 0.6 TPY Federal significant level for lead.

Streamlining

1. MEDEP Chapter 103 regulates particulate matter (PM) emission limits. However, Best Practical Treatment (BPT) is more stringent.

2. Fuel sulfur content is regulated by Chapter 106, however the BPT sulfur limit is more stringent.

3. Chapter 101 is applicable for visible emissions. However, BPT is more stringent.

4. Chapter 138, Section 3H, is applicable for NO_x RACT and an alternative RACT emission limit was used for both heaters.

Periodic Monitoring

Fuel oil record keeping which includes records of hours of oil heater operation, and fuel use based on total monthly oil consumed with hours of operation and percent sulfur by weight provided by fuel oil supplier.

Wood fuel record keeping capable of showing average tons of biomass burned per hour. Compliance will be based on recording the number of fuel meter screw revolutions once per day and quarterly mass of biomass per revolution checks.

Stack testing for PM and NO_x emission rates once every two years.

Periodic monitoring for particulate matter emissions from Stack #1 shall be the following, taken once per shift:

- ESP secondary voltage on each field, and primary and secondary current on each field.

Periodic monitoring for opacity (Stack #1) shall be the following:

1. At least one operator shall be sent to and pass EPA Method 9 training ("smoke school") once per session.
2. The operator attending the training shall conduct on-site review of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be trained by the current Method 9 certified operator.
3. Opacity shall be recorded by a trained operator on a quarterly basis; readings to be taken every 15 seconds for at least 18 consecutive minutes.

C. RTO Units

LP is required by a Federal Consent Decree to operate RTO units on the combined Dryer Vent and on the Press Vent. The RTO units fire propane or natural gas. The Dryer Vent RTO is rated at 13.5 MMBtu/hr and the Press Vent RTO is rated at 11.2 MMBtu/hr. Gases from the Dryer Vent RTO exit through Stack #2; gases from the Press Vent RTO exit through Stack #3.

Streamlining

1. MEDEP Chapter 101 is applicable for visible emissions. However, BPT is more stringent (except during start-up).

2. MEDEP Chapters 103 and 104 regulate PM emission limits. However, the limit stated in Federal Consent Decree CV93-0869 is BPT and is more stringent and shall be used.

3. Fuel sulfur content is regulated by Chapter 106, however the use of propane or natural gas is BPT.

Periodic Monitoring

Dryer Vent and Press Vent RTO inlet pressure.

Dryer Vent and Press Vent RTO isolation damper indicators.

Propane and natural gas record keeping which includes records of fuel use through fuel meter logs, or alternative methods as approved by the Department.

Stack testing for PM and NO_x emission rates once every two years.

Periodic monitoring for opacity (Stack #2 and Stack #3) shall be the following:

1. At least one operator shall be sent to and pass EPA Method 9 training ("smoke school") once per session.
2. The operator attending the training shall conduct on-site review of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be trained by the current Method 9 certified operator.
3. Opacity shall be recorded by a trained operator midway through the bake-out process; readings to be taken every 15 seconds for at least 18 consecutive minutes.

D. Line Dryers

The Core and Surface Line Dryers are rated at 44.0 MMBtu/hr each firing wood or 34.6 MMBtu/hr firing #2 fuel oil and utilize a propane or natural gas pilot. Gases from the dryers pass through a cyclone, wet ESP, the Dryer RTO and exit through Stack #2. In an emergency situation, gases bypass the Line Dryer RTO and vent directly to the atmosphere via Stack #4.

Based on AP-42 factors for lead emissions from the burning of wood/bark (Table 1.6-5, dated 2/98), levels of lead emitted from these pieces of equipment will not trigger the 0.6 TPY Federal significant level for lead.

Streamlining

Fuel sulfur content is regulated by Chapter 106, however BPT is more stringent.

Periodic Monitoring

Fuel oil record keeping documenting the gallons of fuel used in each dryer as determined through fuel meter logs and percent sulfur by weight, provided by fuel oil supplier.

Wood fuel record keeping capable of showing average tons of biomass burned per hour. Compliance will be based on recording the number of fuel meter screw revolutions once per shift and quarterly mass of biomass per revolution checks.

Periodic monitoring for particulate matter emissions from Stack #2 & #4 shall be the following, taken once per shift:

- Wet ESP secondary voltage on each field and secondary current on each field.

E. Hydraulic Press

The hydraulic press has a production limit of 518 tons per day averaged over a seven day period. Gases from the process pass through the Press Vent RTO and exit through Stack #3.

Periodic Monitoring

Production records maintained demonstrating tons of product output on a daily average.

F. Significant Hazardous Air Pollutant (HAP) Emissions

Sources of significant levels of HAP emissions (Lead, Arsenic, Benzene, Acetaldehyde, Acrolein, Formaldehyde, Methanol and Phenol) at LP are the Thermal Oil Heaters, Dryers and Press.

Periodic Monitoring

The amount of finished product per year is proportional to the HAP emissions from the press and dryer. The amount of biomass fired in the TOH is proportional to the HAP emissions from the TOH. Periodic monitoring shall consist of production records maintained demonstrating product output as well as wood fuel record keeping capable of showing average tons of biomass burned per hour in the TOH.

G. Miscellaneous Emissions Unit

The miscellaneous emission unit is a 1.2 MMBtu/hr diesel fire pump.

Streamlining

1. Chapter 101 is applicable for visible emissions, however the BPT opacity limit is more stringent.

2. Chapter 106 regulates fuel sulfur content, however the BPT sulfur limit is more stringent.

Periodic Monitoring

Periodic monitoring shall consist of record keeping which includes hours of operation and percent sulfur by weight (documented through supplier fuel receipts) for the diesel fire pump.

Based on the type and amount of fuel for which the diesel was designed, a properly maintained and operated diesel unit should not exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 is not required. However, neither the EPA nor the DEP is precluded from performing its own testing and may take enforcement action for any violations discovered.

H. Gasoline Storage Tank

LP has one gasoline storage tank on site which must meet the requirement of MEDEP Chapter 118.

I. Fugitive Emissions

Fugitive particulate matter sources at LP include material stockpiles and roadways.

Periodic Monitoring

Based on best management practices, fugitive emission sources should not exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emissions is not required. However, neither the EPA nor the DEP is precluded from performing its own testing and may take enforcement action for any violations discovered.

J. General Process Emissions

Periodic Monitoring

Based on best management practices, it is unlikely that fugitive emission sources will exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emissions is not required. However, neither the EPA nor the state is precluded from performing its own testing and may take enforcement action for any violations discovered.

K. NO_x RACT Requirements

1. Core Line and Surface Line Dryers, Press and RTO Units

The core line and surface line dryers and the press are exempt from RACT because a BACT analysis was conducted for these units in Air Emission License A-327-72-D-A/R.

The RTO units are exempt from RACT because they were previously subject to BACT in Air Emission License A-327-72-E-M and A-327-72-G-M

2. Thermal Oil Heaters

The thermal oil heaters were subject to a RACT analysis in Air Emission License A-327-72-D-A/R. LP shall comply with an alternative RACT emission limit of 0.33 lb/MMBtu from both thermal oil heaters.

3. Fire Pump

The fire pump is limited to 500 hours per year of operation. This limits the potential to emit of the unit to less than 10 tons per year of NO_x and therefore the pump is exempt from RACT.

L. VOC RACT

The core line and surface line dryers and the press are exempt from VOC RACT (Chapter 134) because they were already subject to a BACT analysis in Air Emission License A-327-72-D-A/R.

The RTO units are exempt from RACT because they were previously subject to BACT in Air Emission License A-327-72-E-M and A-327-72-G-M.

The thermal oil heaters are not subject to VOC RACT based on Section 1(C)(4) of Chapter 134, which states equipment that emits VOCs from incomplete combustion only is exempt from RACT.

M. Facility Emissions

The following total licensed annual emissions for the facility are based on the following raw materials used. All usages are based on a 12 month rolling total.

- 58,043 tons per year of biomass (4,090 Btu/lb, 54.5% moisture) in the Thermal Oil Heaters, or equivalent.
- 118,000 gallons per year of #2 fuel oil (0.3% sulfur by weight) in the Thermal Oil Heaters.
- 3,500 gallons per year of specification waste oil (0.7% sulfur by weight) in the Thermal Oil Heaters.
- 1,258,085 gallons of liquid propane or 114,815,534 cubic feet of natural gas in the RTO for the Line Dryers (based on 8760 hours/year).
- 73,584 tons per year of biomass (8,500 Btu/lb, 5.5% moisture) in the Line Dryers, or equivalent.
- 75,000 gallons per year of #2 fuel oil (0.3% sulfur by weight) in the Line Dryers.
- 1,043,745 gallons of liquid propane or 95,254,369 cubic feet of natural gas in the RTO for the Press Vent (based on 8760 hours/year).
- 189,070 tons of finished product per year.
- Diesel Fire pump fuel use of 4,286 gallons per year of diesel fuel (0.05% sulfur by weight).

Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

Pollutant	Tons/Year
PM	154.1
PM_{10}	154.1
SO_2	11.7
NO_X	310.7
CO	917.3
VOC	46.6
Total HAPs*	25.15

*HAPs included are: Lead, Aresenic, Benzene, Acetaldehyde, Acrolein, Formaldehyde, Methanol and Phenol

III. AIR QUALITY ANALYSIS

LP previously submitted an ambient air quality analysis as part of license renewal/amendment A-327-72-D-A/R (signed April 8, 1998) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-327-70-A-I, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emission units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license; (Title 38 MRSA §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;
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(5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;

(6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;
Enforceable by State-only

(8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii)pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and

(c) submit a written report to the Department within thirty (30) days from the date of test completion.

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(13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there where intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement (40 CFR 60.11(g)).

(15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or

the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

(16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.

(17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

(18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(19) The licensee shall submit quarterly reports of any required monitoring as required by the Department. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(e) Such other facts as the Department may require to determine the compliance status of the source;

(21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

(a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or

(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading or other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

(23) Permit Shield for Non-Applicable Requirements
The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated in October, 1999**.**

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	Louisiana-Pacific	40 CFR Part 60, Subpart Dc	Standards of Performance for New Stationary Sources	Thermal Oil heaters #1 and #2, Dryer RTO, Press RTO, Core Line Dryer and Surface Line Dryer are not "steam generating units".
b.	Louisiana-Pacific	40 CFR Part 63, Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	Facility does not produce Group I polymers or resins.
c.	Louisiana-Pacific	40 CFR Part 63, Subpart W	National Emission Standards for Hazardous Air Pollutant Emissions for Epoxy Resins Production and Non-Nylon Polyamides Production.	Facility does not produce epoxy resins or non-nylon polyamides.
d.	Louisiana-Pacific	40 CFR Part 63, Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations.	Facility does not produce wood furniture.
e.	Diesel Fire Pump	Chapter 103, Section 2(B)(1)(a)	Particulate emission limit for fuel burning equipment • 3.0 MMBtu/hr.	Not applicable, unit is < 3.0 MMBtu/hr.

(24) Thermal Oil Heaters #1 and #2

A. LP is licensed to fire wood, #2 fuel oil and specification waste oil in Thermal Oil Heaters #1 and #2. Cleanup residue from the blenders and former infeed conveyors generated during normal plant operations may also be burned. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The maximum firing rate of biomass into Thermal Oil Heaters #1 and #2 shall not exceed 3.3 tons/hr (4,090 Btu/lb, 54.5% moisture) (27.1 MMBtu/hr) per Thermal Oil Heater. Compliance shall be demonstrated by recording the number of fuel meter screw revolutions once per day and quarterly mass of biomass per revolution checks. Records shall be kept on a 12 month rolling total.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. The maximum heat input capacity from the firing of fuel oil into Thermal Oil Heaters #1 and #2 shall not exceed 20.0 MMBtu/hr (143 gal/hr) per Thermal Oil Heater demonstrated by fuel oil record keeping which includes records of hours of oil heater operation, and fuel use based on total monthly oil consumed with hours of operation and percent sulfur by weight provided by fuel oil supplier.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. LP is limited to 29,021.5 tons of biomass per year in each of the Thermal Oil Heaters (4,090 Btu/lb, 54.5% moisture) based on a 12 month rolling total (record keeping as described in Condition 24 (B)).
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

E. LP is limited to 118,000 gallons of #2 fuel oil per year in the Thermal Oil Heaters (based on a 12 month rolling total), with a sulfur content not to exceed 0.3% by weight demonstrated by purchase records from the supplier.
[MEDEP Chapter 140, BPT]

F. LP is limited to 3,500 gallons of specification waste oil per year (based on a 12 month rolling total), with a sulfur content not to exceed 0.7%. Only bearing grease, oil soaked rags, and floor sweepings containing oil shall be burned.

Compliance shall be based on record keeping of the amount of used oil drawn from the "Used Oil" barrel. The amount of oil contained on the rags has been estimated at less than 50 gallons per year based on testing performed by LP and is therefore considered insignificant.

[MEDEP Chapter 140, BPT]

G. Particulate matter (PM, PM_{10}) emissions from the TOH shall be controlled by the operation and maintenance of a centrifugal cyclone separator followed by an electrostatic precipitator (ESP).

LP shall operate, at a minimum, the number of ESP chambers and number of fields per chamber that operated during the most recent demonstration of compliance with the licensed particulate emission limits. Data for the following points in the ESP shall be recorded once per shift during operation:

1) Secondary voltages on each field
2) Primary current on each field
3) Secondary current on each field

[MEDEP Chapter 140, BPT]

Upon written notification to the Department, and in accordance with the Bureau of Air Quality's Air Emission Compliance Test Protocol, LP may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall LP be relieved of its obligation to meet its licensed emission limits.
[MEDEP Chapter 140, BPT]

H. Emissions from both Thermal Oil Heaters (combined) shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority
PM	0.15	MEDEP, Chapter 103, Section 2(B)(4)(a)
NO_X	0.33	MEDEP, Chapter 138, Section 3H, alternative RACT

Pollutant	lb/hr	Origin and Authority
PM	8.1	MEDEP Chapter 140, BPT
PM_{10}	8.1	MEDEP Chapter 140, BPT
SO_2	6.2	MEDEP Chapter 140, BPT
NO_X	19.0	MEDEP Chapter 140, BPT
CO	106.6	MEDEP Chapter 140, BPT
VOC	3.6	MEDEP Chapter 140, BPT

(25) Dryer Vent RTO

A. LP is licensed to fire propane or natural gas in the Dryer Vent RTO.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The maximum heat input capacity from the firing of propane into the Dryer Vent RTO shall not exceed 144 gal/hr (13.5 MMBtu/hr) demonstrated by flow meter logs or fuel flow recording charts.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. LP shall maintain records of the Dryer Vent RTO hours of operation and propane or natural gas use indicating the quantity of fuel consumed, demonstrated by fuel meter logs.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. Particulate matter (PM, PM_{10}) emissions from the Line Dryers shall be controlled by the operation and maintenance of a centrifugal cyclone separator followed by a wet electrostatic precipitator (ESP) prior to being introduced to the Dryer Vent RTO.

LP shall operate, at a minimum, the number of ESP chambers and number of fields per chamber that operated during the most recent demonstration of compliance with the licensed particulate emission limits.
[MEDEP Chapter 140, BPT]

Upon written notification to the Department, and in accordance with the Bureau of Air Quality's Air Emission Compliance Test Protocol, LP may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall LP be relieved of its obligation to meet its licensed emission limits.
[MEDEP Chapter 140, BPT]

E. Emissions from the Dryer Vent RTO (stack #2) shall not exceed the following limits:

Pollutant	gr/dscf	Origin and Authority
PM	0.015	Federal Consent Decree CV93-0869-L-O

Pollutant	lb/hr	Origin and Authority
PM	15.6	MEDEP Chapter 140, BPT
PM_{10}	15.6	MEDEP Chapter 140, BPT
SO_2	21.2	MEDEP Chapter 140, BPT
NO_X	32.9	MEDEP Chapter 140, BPT
CO	109.0	MEDEP Chapter 140, BPT
VOC	5.6	MEDEP Chapter 140, BPT

(26) Press Vent RTO

A. LP is licensed to fire propane or natural gas in the Press Vent RTO.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The maximum heat input capacity from the firing of propane into the Press Vent RTO shall not exceed 120 gal/hr (11.2 MMBtu/hr) demonstrated by flow meter logs or fuel flow recording charts.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. LP shall maintain records of the Press Vent RTO hours of operation and propane or natural gas use indicating the quantity of fuel consumed, demonstrated by fuel meter logs.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. Emissions from the Press Vent RTO (stack #3) shall not exceed the following limits:

Pollutant	gr/dscf	Origin and Authority
PM	0.015	Federal Consent Decree CV93-0869-L-O

Pollutant	lb/hr	Origin and Authority
PM	12.3	MEDEP Chapter 140, BPT
PM_{10}	12.3	MEDEP Chapter 140, BPT
SO_2	0.2	MEDEP Chapter 140, BPT
NO_X	20.5	MEDEP Chapter 140, BPT
CO	8.3	MEDEP Chapter 140, BPT
VOC	1.75	MEDEP Chapter 140, BPT

(27) Dryer Vent & Press Vent RTO Parametric Monitors[MEDEP Chapter 140, BPT]

LP shall maintain and operate the following parameter monitors continuously as part of the Parametric Monitoring Plan required by Federal Consent Decree CV93-0869 and approved by the EPA:

Dryer Vent and Press Vent RTO combustion chamber temperature.

Dryer Vent and Press Vent RTO outlet air flow monitor.

Note, "continuous" is defined as: Equally spaced data points with at least one data point for each successive 15-minute period. A minimum of three evenly spaced data points constitutes a valid hour.

Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

(28) Dryer Vent and Press Vent RTO Periodic Monitoring

LP shall record the Dryer Vent and Press Vent RTO inlet static pressure once per hour as part of the Parametric Monitoring Plan required by Federal Consent Decree CV93-0869 and approved by the EPA.

LP shall document the opening and closing of the Dryer Vent and Press Vent RTO isolation dampers as part of the Parametric Monitoring Plan required by Federal Consent Decree CV93-0869 and approved by the EPA.

(29) Line Dryers

A. LP is licensed to fire wood and #2 fuel oil in the Line Dryers and propane or natural gas in the pilots.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The maximum firing rate of biomass into the Core Line Dryer and Surface Line Dryer shall not exceed 4.2 tons/hr (8,500 Btu/lb, 5.5% moisture) (44.0 MMBtu/hr) per Dryer. Compliance shall be demonstrated by recording the number of fuel meter screw revolutions once per shift and quarterly mass of biomass per revolution checks.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. The maximum heat input capacity from the firing of fuel oil into Core Line Dryer and Surface Line Dryer shall not exceed 247 gal/hr (34.6 MMBtu/hr) per Dryer demonstrated by flow meter logs or oil flow recording charts.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. LP is limited to 36,792 tons of biomass per year in each of the two Line Dryers (8,500 Btu/lb, 5.5% moisture) based on a 12 month rolling total.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

E. LP is limited to 75,000 gallons of #2 fuel oil per year in the Line Dryers (based on a 12 month rolling total), with a sulfur content not to exceed 0.3% by weight demonstrated by purchase records from the supplier.
[MEDEP Chapter 140, BPT]

(30) The line dryers shall not operate unless the wet ESP and Dryer Vent RTO are operating. The main forming line shall not operate unless the Press Vent RTO is operating. For safety and fire hazard concerns, LP shall be allowed a maximum of 15 minutes from the time the RTO goes down to shut down the production line. Compliance shall be demonstrated by logbooks.
[MEDEP Chapter 140, BPT]

(31) LP shall not combust treated or pressurized wood at this facility, except for waste produced in the process of manufacturing OSB.
[MEDEP Chapter 140, BPT]

(32) Visible emissions shall be recorded for Stack #1 on a quarterly basis; readings to be taken every 15 seconds for at least 18 consecutive minutes.

A. At least one operator shall be sent to and pass EPA Method 9 training ("smoke school") once per session (two times per year).
B. The operator attending the training shall conduct on-site review of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be re-trained by the current Method 9 certified operator.
C. Opacity shall be recorded by a trained operator on a quarterly basis; readings to be taken every 15 seconds for at least 18 consecutive minutes.

[MEDEP Chapter 140, BPT]

(33) Visible emissions shall be recorded for Stack #2 and #3 during bake-outs; bake-out readings to be taken every 15 seconds for at least 18 consecutive minutes.

A. At least one operator shall be sent to and pass EPA Method 9 training ("smoke school") once per session (two times per year).
B. The operator attending the training shall conduct on-site review of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be re-trained by the current Method 9 certified operator.
C. Opacity shall be recorded by a trained operator midway through the bake-out process; readings to be taken every 15 seconds for at least 18 consecutive minutes.

[MEDEP Chapter 140, BPT]

(34) Visible Emissions from Stack #1, #2, and #3

Visible emissions from Stack #1 (Thermal Oil Heaters), #2 (Dryer Vent RTO), or #3 (Press Vent RTO) shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period.

For RTO start-ups during the bake-out process, visible emissions shall not exceed 30% for 2 hours except for 30 minutes which cannot exceed 70%.

[MEDEP Chapter 140, BPT]

(35) LP shall perform **particulate matter** (**PM**) stack testing by August 31, 2002 and thereafter on a biennial basis, on the Thermal Oil heater stack (Stack #1), the Dryer Vent stack (Stack #2) and the Press Vent stack (Stack #3).

PM testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 5, or other methods or testing scenarios approved by the Department.

A full engineering report shall be prepared for all required stack testing, including an evaluation of test procedures, test results, and source operations. LP shall submit such report to the Bureau of Air Quality within 30 days after testing. All testing programs shall comply with all of the requirements of the DEP compliance stack testing protocol.
[MEDEP Chapter 140, BPT]

(36) LP shall perform **nitrogen oxides** (NO_x) stack testing by August 31, 2002 and thereafter on a biennial basis, on the Thermal Oil heater stack (Stack #1), the Dryer Vent stack (Stack #2) and the Press Vent stack (Stack #3).

NO_x testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 7E, or other methods or testing scenarios approved by the Department.

A full engineering report shall be prepared for all required stack testing, including an evaluation of test procedures, test results, and source operations. LP shall submit such report to the Bureau of Air Quality within 30 days after testing. All testing programs shall comply with all of the requirements of the DEP compliance stack testing protocol. After two consecutive tests with passing results LP may petition the Department to have the NO_x stack testing requirement for Stack #2 and #3 removed.
[MEDEP Chapter 140, BPT]

(37) Hydraulic Press

LP shall limit the production of oriented strand board product not to exceed 518 tons of finished product per day. This shall be averaged over a seven day period. Appropriate records shall be maintained to demonstrate compliance with this condition, and made available to the Department upon request.
[MEDEP Chapter 140, BPT]

(38) LP shall maintain a log detailing maintenance and any malfunctions that occur to all air pollution control equipment along with RTO bake-out times, dates, and durations shall be kept, and made available to representatives of the Department upon request.
[MEDEP Chapter 140, BPT]

(39) **Miscellaneous Emission Units**

Emission Unit	Origin and Authority	Requirement Summary
Diesel Fire Pump	Chapter 101, Section 2(A), Chapter 140, BPT	Visible emissions shall not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than two (2) six (6) minute block averages in a 3-hour period.

[MEDEP Chapter 140, BPT]

(40) **Diesel Fire Pump**
The diesel fire pump shall be limited to 500 hours of operation per year, firing 0.05% sulfur (documented through supplier fuel records) diesel fuel, based on a 12 month rolling total. Hours of operation shall be kept by an hour meter on the fire pump. Fuel purchase receipts indicating percent sulfur by weight shall be kept as well. LP may deplete their current stock of diesel fuel for the diesel fire pump. Any further diesel fuel purchases for the diesel fire pump shall not exceed 0.05% sulfur by weight.
[MEDEP Chapter 140, BPT]

(41) **General Process Sources**
Visible emissions from any general process source (including the waferizer) shall not exceed an opacity of 20% on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period.
[MEDEP Chapter 140, BPT]

(42) **Fugitive Emissions**
Potential sources of fugitive PM emissions, including material stockpiles and roadways, shall be controlled by wetting with water, with calcium chloride, or other methods, as needed, as approved by the Bureau of Air Quality to prevent visible emissions in excess of 10% opacity, based on a 3 minute block average.

[MEDEP Chapter 140, BPT] **Enforceable by State Only**

(43) **Hazardous Air Pollutants**

LP shall limit facility wide HAP emissions to 25.15 tons per year. Compliance shall be based the following:

HAPS from the Thermal Oil Heaters

Tons of Biomass burned/year in the TOH X 0.05 lb HAP/Ton of Biomass

Plus

Gallons of #2 fuel oil burned/year in the TOH X 2.24×10^{-6} lb HAP/Ton of Boimass

Plus

Gallons of waste oil burned/year in the TOH X 0.0275 lb HAP/Ton of Biomass

Plus

HAPS from the Dryers

TFP/year X 0.187 lb HAP/ODT X 1.22 ODT/TFP

Plus

HAPS from the Press

TFP/year X 0.012 lb HAP/MSF X 1.6 MSF/TFP

Equals Pounds of HAP emitted. Divide by 2000 to get Tons of HAP emitted.

TFP	=	Tons of Finished Product
ODT	=	Oven Dried Ton
MSF	=	1000 Square Feet

[MEDEP Chapter 140, BPT] **Enforceable by State Only**

(44) **Gasoline Storage Tank** [MEDEP Chapter 118]

A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank.
B. The licensee shall maintain records of the monthly and annual throughput of gasoline.

(45) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.
[40 CFR Part 82, Subpart F]

(46) **Storage Tanks**

The two 15,000 gal phenolic resin and one 22,000 gal MDI Storage Tanks are subject to 40 CFR Part 60, Subpart Kb. As such, LP shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessels. These records shall be kept for the life of the source.

[40 CFR Part 60, Subpart Kb]

(47) **Recordkeeping** [MEDEP Chapter 140, BPT]

For all of the equipment parameter monitoring (reference Condition 27) and recording required by this license, the licensee shall maintain records of the most current six year period. All parameter records shall be made available to the Bureau of Air Quality upon request.

(48) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due every 6 months, and the initial semiannual report is due July 31, 2001.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(49) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department and EPA in accordance with Condition (20) of this license. The initial annual compliance certification is due January 31, 2002.

[MEDEP Chapter 140]

(50) **Annual Emission Statement**

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory.

[MEDEP Chapter 137]

(51) The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(52) **Certification by a Responsible Official**
All reports (including semiannual reports and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official.
[MEDEP Chapter 140]

(53) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of Phase I application: March 23, 1998
Date of Phase I application acceptance: March 23, 1998
Date of initial receipt of Phase II application: October 28, 1999
Date of Phase II application acceptance: October 28, 1999

Date filed with the Board of Environmental Protection _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality.